

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA  
NORTHEASTERN DIVISION**

<b>Jamon T. Brim,</b>	)	
	)	
<b>Plaintiff</b>	)	
	)	
<b>v.</b>	)	<b>Civil No. 5:10-CV-369-IPJ</b>
	)	
<b>Dell Financial Services, LLC,</b>	)	
<b>Midland Credit Management,</b>	)	
<b>Inc., Midland Funding, LLC,</b>	)	
	)	
<b>Defendants.</b>	)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
RESPONSES TO DEFENDANT’S POST-TRIAL MOTIONS**

Comes now the Plaintiff, Jamon T. Brim, and hereby requests this Honorable Court to allow Plaintiff an additional three days to respond to each of the Defendant’s post-trial motions. In support of this motion, the Plaintiff states as follows:

1. On March 28, 2011, the Defendant filed Motions for Remittitur and Constitutional Reduction of Punitive Damages Award; New Trial; and Judgment as a Matter of Law or, alternatively, that the Judgment be Vacated.
2. Leonard Bennett and Ronald Sykstus, two of Plaintiff’s counsel had previously scheduled family vacations during the fourteen days previously allowed by the Court for the Plaintiff to respond.

3. Counsel for the Defendant, Midland Credit Management, does not oppose the additional time requested by the Plaintiff to respond to said motions.

Wherefore, premises considered, the Plaintiff respectfully requests that the Court allow the Plaintiff until Friday, April 15, to file responses to each of the Defendant's post-trial motions.

Respectfully submitted this 11th day of April, 2011.

/s/ Penny Hays Cauley

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Attorney for Plaintiff

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 11, 2011, I electronically filed the foregoing via the CM/ECF System, which will notify the following counsel of record:

Eric B. Langley, Esq.  
Jason B. Tompkins, Esq.  
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/s/ Penny Hays Cauley  
Of Counsel